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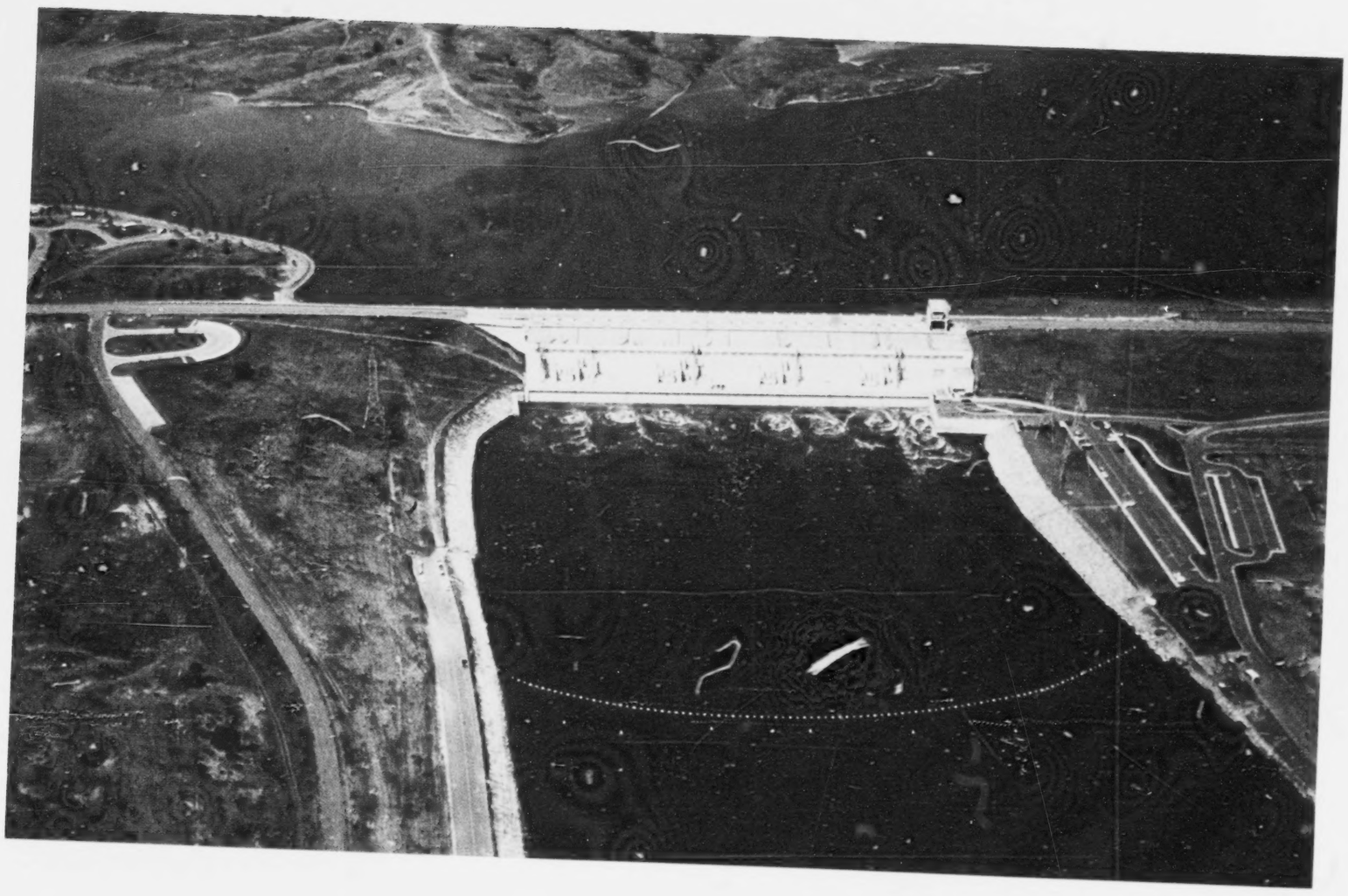
Introduction to the Environmental Review Guide for Operations (ERGO)



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Introduction

A central feature of the U.S. Army Corps of Engineers' environmental ethic is the need to be a pro-active leader in focusing on environmental compliance at its many diverse projects. The Corps holds a high profile position on environmental issues. Given recent court decisions, its facility managers need clear direction on meeting compliance requirements. A comprehensive system to achieve, maintain, and monitor compliance with environmental laws and regulations is necessary for the Corps to fully meet its stewardship responsibilities at facilities entrusted to it by the Nation.

> ERGO is a pro-active approach to environmental protection and legal compliance.

A major component in the effectiveness of any program is the level of support it receives from those in authority. This applies to all levels of authority. Each manager is responsible for risks on his/her project — including anything that damages the environment. Managing environmental programs means liability for what happens or fails to happen when required. An effective Environmental Review Guide for Operations (ERGO) program will help minimize that risk.

ERGO is not designed to be another inspection program. Rather, it is a pro-active approach intended to assure that potential problems with environmental protection and compliance issues are identified promptly and that the full range of specialties available within the Corps can be involved in their resolution.

ERGO History

The ERGO program began with the creation of a steering committee of project, district, and division operational personnel. A series of working meetings were held to develop a manual that would help managers achieve, maintain, and monitor compliance with environmental laws and regulations. The goal of the ERGO program is to provide tools for managers to ensure all their facilities and projects are in compliance with Federal, State, local, and environmental engineering regulations. Some deficiencies in Corps compliance with environmental laws and regulations result from misunderstanding the requirements; others from lack of awareness of the most recent changes in environmental regulations. When the ERGO manual is used effectively, environmental issues can be identified and resolved early.

The core of the ERGO program is a self-evaluation that results in a comprehensive compliance "snapshot" identifying an environmental program's strengths, weaknesses, and specific problems. With this information, a manager can effectively run a program to achieve and maintain compliance with the complex and ever-growing body of environmental regulations.

Objectives

Objectives of an ERGO evaluation are to:

- Enhance Corps of Engineers environmental compliance at Federal, State, and local levels.
- Improve Corps of Engineers environmental management.
- Build supporting budget requirements.
- Assure supervisors their environmental programs are being implemented effectively in accordance with USACE goals and objectives.

Periodic internal environmental compliance evaluations are necessary. The evaluations are designed to assess environmental compliance and to provide necessary feedback so supervisors can organize, direct, and control environmental compliance and protection activities.

Corps of Engineers personnel at every level are responsible for implementing the ERGO program. Key players will come from a wide range of specialties; expertise in specific areas provides the framework for a comprehensive environmental program. This multidisciplinary approach is essential to resolving environmental issues because most activities that affect the environment must be assessed from various perspectives to achieve the most effective environmental management.

The Evaluation Process

The environmental review is divided into 11 categories or sections. ERGO evaluations may be accomplished either one section at a time, or all sections comprehensively. A comprehensive evaluation will make planning and budgeting easier and will provide a clearer picture of the overall environmental compliance status of a project. A comprehensive assessment could be expanded to encompass an entire district. ERGO reviews may be conducted by project staff, project/district teams, Corps/State environmental agency teams, contractors, etc.

A thorough evaluation will identify various deficiencies and areas that need attention. A closer look should be taken if no deficiencies are noted. The size and complexity of most Corps projects practically guarantees that they will not achieve continuous 100 percent compliance with the multitude of Federal, State, local, and environmental engineering regulations.

During the evaluation, deficiencies that can be corrected quickly and easily should be taken care of promptly. However, even these items should be documented for historical reference. Tracking relatively minor deficiencies over a period of time may help to identify a root cause, such as inadequate training.

Long-term deficiencies will have to be examined much more closely. Alternatives as well as solutions may have to be considered before corrective action can be taken. It is imperative to follow all unresolved issues to ensure their correction.

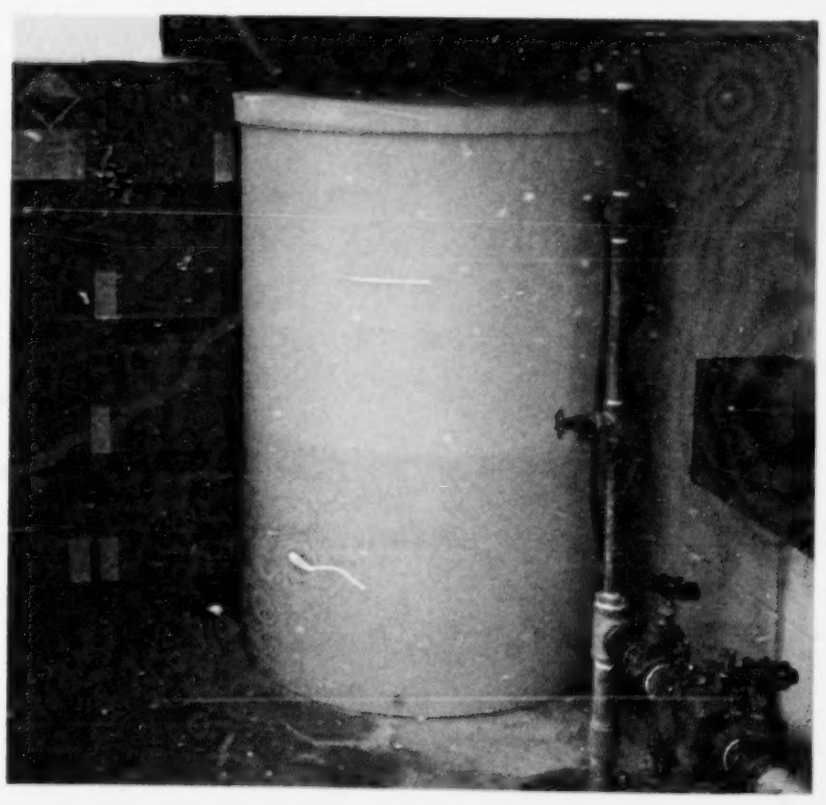
The ERGO Manual

The ERGO manual is the primary tool for conducting environmental self-evaluations at Corps projects. The manual compiles applicable Federal and engineering regulations, combines them with good management practices and risk management issues, and consolidates this information into checklists. A checklist is provided for each of the 11 general environmental categories into which the manual is divided. These 11 categories are listed on the following pages.

Air Emissions

The Air Emissions section covers major sources of air pollution emissions at facilities, including:

- Storage and transfer of certain fuels and chemicals,
- Degreasing and other solvent processes, and
- Fuel burning at steam and hot water generating plants and boilers.



Cultural/Historic Resources Management

The Cultural/Historic Resources Management section pertains to plans and programs for protection and management of:

- Prehistoric archeological sites,
- Historic archeological sites,
- Historic structures,
- Historic districts,
- Native religious sites, and
- Culturally significant structures and sites.

Hazardous Waste Management

The Hazardous Waste Management section applies to facilities that generate, store, treat, or dispose of any type of hazardous waste. Federal regulation establishes 100 kilograms (about six barrels) per month as the minimum quantity of generated waste that requires compliance with the regulation. Because hazardous waste regulations are undergoing rapid expansion at all levels of government, this is a large section of the ERGO Manual.

Hazardous Materials Management

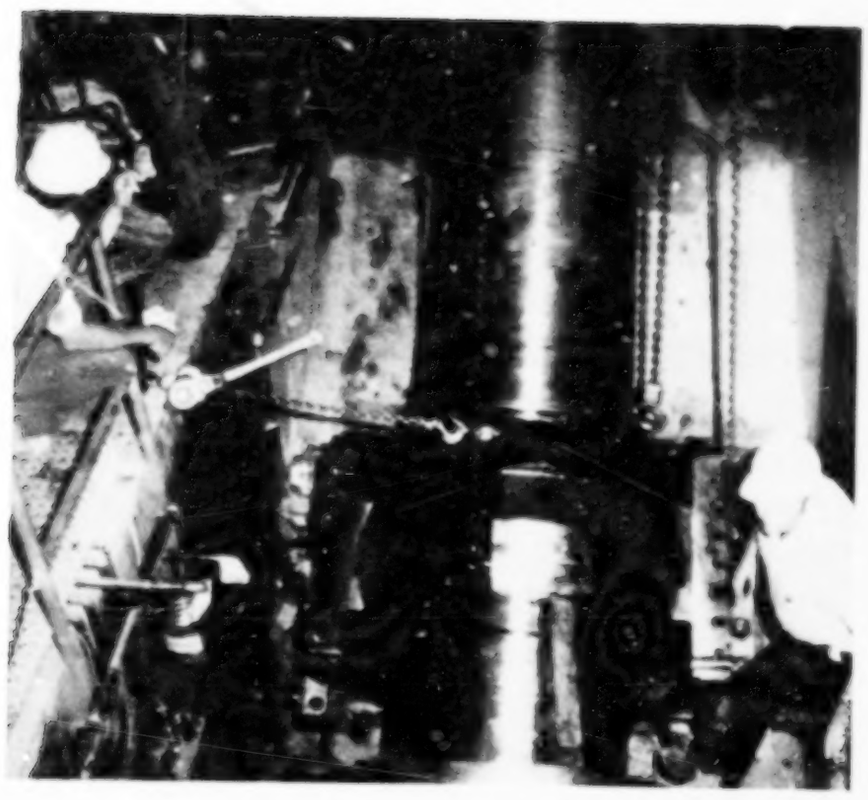
The Hazardous Materials Management section covers the management of chemicals that have hazardous properties, including:

- Toxic chemicals,
- Flammable substances,
- Reactive substances, and
- Corrosive materials.

Natural Resources Management

The Natural Resources Management section pertains to plans and programs for protection and management of:

- Land,
- Forests and rangeland,
- Endangered species, and
- Fish and wildlife habitat.



POL Management

The Petroleum, Oil, Lubricant (POL) section applies to facilities that store, transport, dispose of, or use petroleum-based fuels or lubricants.

Pesticide Management

The Pesticide Management section covers the use, storage, handling, and disposal of pesticides, which is an inclusive term for herbicides and insecticides.

Solid Waste Management

The Solid Waste Management section addresses the collection, storage, and disposal of nonhazardous trash, rubbish, garbage, bulky wastes, and containerized liquids or sludges.

Underground Storage Tanks

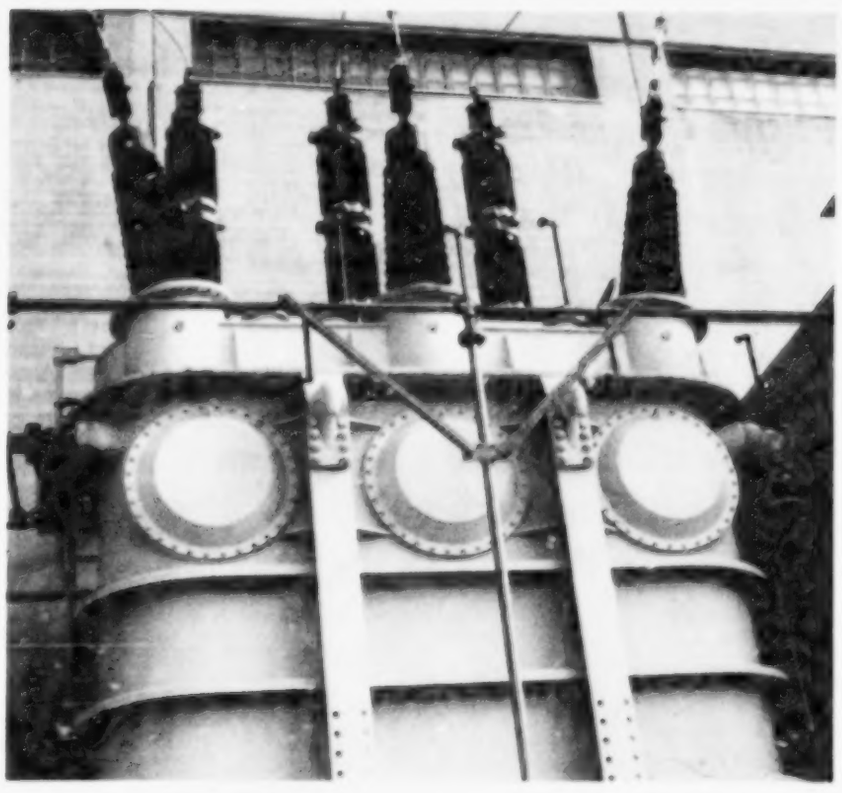
The Storage Tanks section addresses underground storage tanks (USTs) used to store hazardous materials or petroleum products and includes:

- Installation of new systems,
- Maintenance of existing systems of tanks and piping, and
- Repair, replacement, or permanent removal of USTs.

Special Pollutants

The Special Pollutants section addresses various other programs and will be modified over time as old issues are resolved and new issues arise. This section currently includes:

- Asbestos,
- Noise management,
- Polychlorinated Biphenyls (PCBs), and
- Radon.



Wastewater Discharge

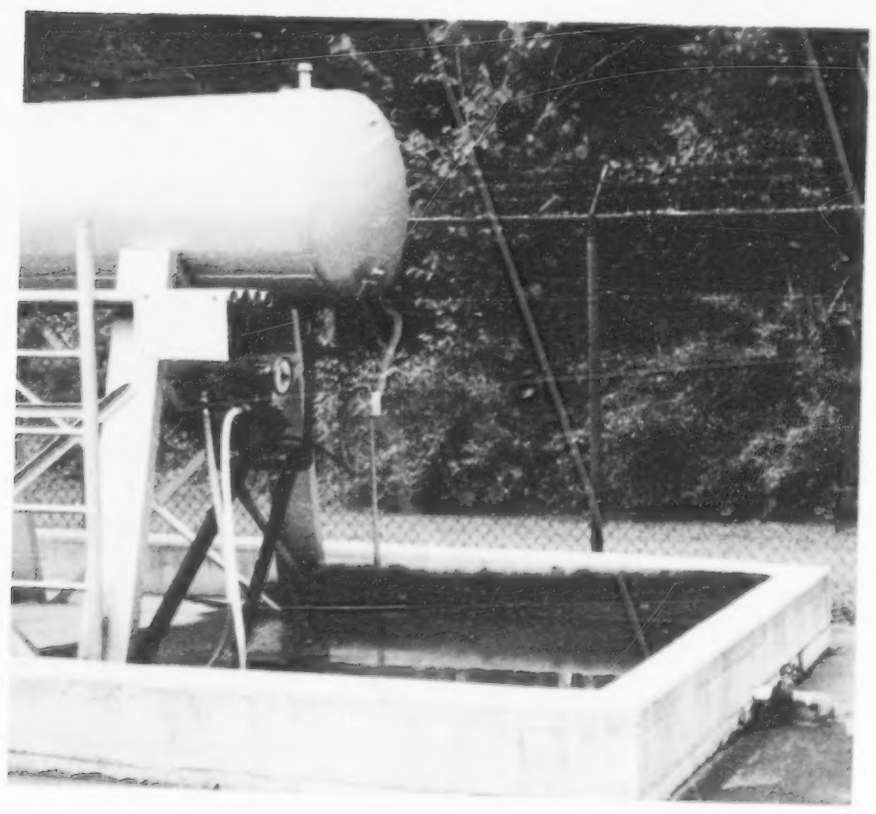
The Wastewater section addresses regulations, responsibilities, and compliance requirements associated with wastewater discharge and can include any of the following:

- Sanitary wastewater discharged directly to a receiving stream, or through a Corps treatment facility,
- Sanitary or industrial wastewater discharged to a public-owned treatment plant or other non-Corps facility, and
- Storm water runoff from operation areas of the facility to a receiving stream or body of water.

Water Quality

The Water Quality section applies to all surface or groundwater used or managed by the Corps and includes:

- Public water supplies for which a Corps facility has jurisdiction,
- Protection of wellhead areas,
- Construction and operation of underground injection wells, and
- Contamination of sole source aquifers.



Summary

As a steward of the environment and a leader in the environmental field, the Corps of Engineers cannot afford to have a passive environmental program at its own projects. ERGO is an essential tool for establishing a pro-active environmental program. The information ERGO provides will identify deficiencies and support the correction of environmental problems. Increased environmental awareness promotes environmental compliance and reduces the risk of legal action.

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